

Visual Inspection Plan to Evaluate Work Performance

NVL Laboratories, Inc.

Office: (206) 547-0100

Fax: (206) 634-1936

Date: December 28, 2019

NVL Project No. 2012-949

Site Address: Rainer Commons
3100 Airport Way S, Seattle, 98134

Introduction:

NVL Laboratories has prepared this Visual Inspection Plan to Evaluate Work Performance to document procedures to ensure that paint is removed at the completion of each Individual Phased Work Plan (IPWP) as outlined in the Rainier Commons Work Plan dated March 25, 2013, revised July 25, 2013 ("Work" or "Plan"), and meets the requirements of the EPA risk based approval for the Plan.

Requirements:

Condition 7 of EPA's approval of the Work Plan, "Rainier shall **evaluate the performance of the work through visually examining 100 percent of the surface from which paint was removed, and conducting detailed verification visual analysis of 2 percent of the substrate** pursuant to the description provided in the Work Plan and the conditions herein."

The requirements include:

1. EPA requires complete removal of all visible paint to satisfy the requirements of this approval.*
2. If paint remains after blasting is conducted additional remediation is necessary to meet the terms of this approval.
3. If a remediation method that is not listed in the Accepted Abatement Methods on Page 8 of the Work Plan is deemed necessary by Rainier to remove all exterior paint, Rainier will seek EPA approval prior to commencing paint abatement activities following the procedures in Section 3, page 9 of the Work Plan.
4. EPA requires the use of a numbered grid and a random number selector for this process.
5. The proposed grid, inspection locations and inspection methodology shall be included in each IPWP for EPA approval.

* = Note: What this is interpreted to mean "visually" per the Work Plan: "The goal will be complete removal of the paint, with the understanding that the infrequent, small fleck of paint remaining post-abatement is functionally unavoidable as a practical matter. Complete removal and completely clean to visual inspection will be required of the Contractor."

Inspection Schedule:

Per the Process Steps described in the Work Plan, a summary of the steps include:

- Step #6 – Notification by Contractor to NVL that paint removal is complete and ready for inspection.
- Step #7 – General inspection by NVL of paint removal and determination if paint removal is complete:
 - If not complete, further action by Contractor and repeat of abatement work described in Step #4
 - If complete, then proceed to step 8
- Step #8 – Compliance Inspection, including what is detailed in this document as the Visual Inspection Plan to Evaluate Work Performance. After inspection:
 - If accepted, work activities proceed to Step #9
 - If not accepted, then work activities will be to conduct required action, most likely returning to Step #4

Methodology:

A Certified Industrial Hygienist (CIH) will oversee all visual inspection, analysis, data interpretation and reporting involved with the Work and the IPWPs.

Visual Inspection of 100 Percent of Area Abated

When the Contractor notifies NVL that a level, or segment of work, is complete and ready for inspection, qualified NVL personnel will walk each level, either ground or scaffold level, and visually scan the entire work area for any residual paint, with Contractor performance and contract compliance requirements in mind. Provisional acceptance of the work will be carried out as outlined in the Work Plan.

Detailed Visual Inspection on Randomly Selected Two Percent (2%) of Surfaces Abated

After NVL has provisionally accepted the work, NVL then will carry out the verification inspection as follows:

1. Using a rough calculation of the total square footage of the abated surface area ready for inspection, a record of the dimensions and calculation will be made on a set of Field Notes.
2. The calculation of the area to be inspected will be made finding two percent of the total square footage of the area ready for inspection. The areas inspected will be recorded in the Field Notes.
3. Before the verification inspection begins, a simple diagram will be drawn of the inspection area in the Field Notes. These diagrams are to be carefully drawn, but hand drawn to approximate scale for record keeping purposes is acceptable. The locations of the areas inspected should be recorded on the diagrams. Perfect or

exact scale drawings are not required. The distribution of the inspection area (two percent of the total area) may be in one location or broken up into two or more locations at NVL's discretion depending upon the overall size of the particular inspection area.

4. NVL shall use its discretion to field measure and mark out the inspection area in the most efficient manner possible with chalk or masking tape or other media. NVL personnel shall make a detailed and close visual inspection of the area.
5. NVL shall photograph the inspection area and make the photographs a part of the Field Notes, captioning or documenting within the photograph the area that it represents.
6. The investigation area shall be designated with the building number, the ordinal direction of the elevation or wall (N=north facing, S=south facing, E=east facing, W=west facing) and the level (G=ground, 1=first level of scaffolding and so on). So, for example, if the west facing wall of building 13 is investigated on the 2nd level of scaffolding the investigation area will be designated in the Field Notes and in the photograph(s) as 13-W-2.

Reporting:

A written report will be provided by NVL to Rainier Commons to provide to the EPA within 30 days of visual assessment. The report will include a description of the inspection locations and conditions as well as site photos.